

UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:
ROBERT X. BAEZ-ORTIZ
DEBTOR (S)

CASE NO: 20-01021 ESL
CHAPTER 13

MOTION REQUESTING RECONSIDERATION OF ORDER DISMISSING CASE
DATED December 12, 2022, DOCKET 36

TO THE HONORABLE COURT:

COMES NOW, debtor(s) through the undersigned attorney and to this Honorable Court respectfully state(s), allege(s) and pray(s) as follows:

1. On November 8, 2022, chapter 13 standing trustee filed "Trustee Motion to Dismiss" (docket #35).
2. In the motion chapter 13 standing trustee pointed out that Debtor(s) had failed to submit tax returns for years 2020 and 2021.
3. On December 12, 2022, this Honorable Court issued an Order dismissing debtor case (docket number 36).
4. On December 21, 2022 debtor sent to TEDFA trustee upload system evidence of Tax Returns for years 2020 and 2021. Debtor informs that he receives income tax refunds, debtor informs that it is compiling the extraordinary expenses in which the reimbursements were used to file a motion to ratify income tax refunds.
5. Debtor(s) need to continue with their bankruptcy protection and obtain a discharge. Debtor's need to complete chapter 13 plan payments.
6. Debtor respectfully request that due to the above-mentioned extraordinary circumstances, under Rule 9024 making applicable F.R.Civ.P Rule 60(b), this Honorable Court to reconsider Court Order dismissing the case dated August 23, 2022 Docket 56 and allow debtor to complete their Bankruptcy plan payment.

WHEREFORE, debtors respectfully request to this Honorable Court to reconsider Order dismissing the case dated December 12, 2022, Docket 36 and allow them to continue with the US Bankruptcy Court protection.

NOTICE

Within ten (10) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE: Due to the emergency situation regarding Coronavirus, notice through regular mail is not available at this time. Notices will be provided only through electronic means. In light of this, the attorney certifies that this document has been filed using the CM/ECF system which will send notice to all CM/ECF participants in this case.

Respectfully Submitted

In Bayamon to San Juan, Puerto Rico this December 21, 2022.

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